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PROPOSED ATTORNEYS FOR
DEBTOR-IN-POSSESSION

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF WYOMING**

In re:)	
)	Case No. 24-20138
BOTW HOLDINGS, LLC)	
EIN)	Chapter 11 (Subchapter V)
)	
)	
In re:)	
)	Case No. 24-20141
HUSKEMAW OPTICS, LLC)	
EIN)	Chapter 11 (Subchapter V)
)	
)	
In re:)	
)	Case No. 24-20142
BEST OF THE WEST)	
PRODUCTIONS, LLC)	Chapter 11 (Subchapter V)
EIN)	
)	

**JOINT MOTION FOR ORDER DIRECTING JOINT ADMINISTRATION OF
RELATED CHAPTER 11 CASES FOR PROCEDURAL PURPOSES ONLY
AND ENTRY OF RELATED RELIEF**

Debtors BOTW Holdings, LLC (“BOTW”), Huskemaw Optics, LLC (“Huskemaw”) and Best of the West Productions, LLC (“Productions”) (collectively the “Debtors”), debtors and debtors-in-possession in the above-captioned chapter 11 cases, by and through undersigned counsel/proposed counsel, hereby move the Court for entry of an

order, pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure and Local Bankruptcy Rule 1015-1, authorizing and directing the joint administration of these related chapter 11 cases for procedural purposes only. In support of this motion, the Debtors state as follows:¹

JURISDICTION

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 157 and 1334. This is a court proceeding pursuant to 28 U.S.C. § 157(b)(2) and venue is proper in this district and before this Court pursuant to 28 U.S.C. § 1408 and 1409. The statutory predicates for relief requested herein are Fed. R. Bankr. P. 1015 and Local Bankruptcy Rule 1015-1.

BACKGROUND

2. On April 19, 2024 (the “Petition Date”), BOTW filed a voluntary petition for relief under chapter 11, subchapter V, of the Bankruptcy Code in the United States Bankruptcy Court for the District of Wyoming (the “Court”).

3. On April 21, 2024, Huskemaw filed a voluntary petition for relief under chapter 11, subchapter V, of the Bankruptcy Code in this Court.

4. On April 22, 2024, Productions filed a voluntary petition for relief under chapter 11, subchapter V, of the Bankruptcy Code in this Court.

5. The Debtors are authorized to operate their business and manage their properties as debtors-in-possession under §§ 1107(a) and 1108. No creditors’ committee is

¹ Unless otherwise specified, all references herein to “Section,” “§,” “Bankruptcy Code” and “Code” refer to the U.S. Bankruptcy Code, 11 U.S.C. § 101, *et seq.*

appointed in the chapter 11 cases by the Office of the United States Trustee, nor has any trustee or examiner been requested or appointed.

6. The Debtors are Wyoming limited liability companies based in Cody, Wyoming. The Debtors are involved in the outdoor industry, having evolved from their original focus on outdoor industry video production company to offering optics for long-range shooting systems.

7. Holdings is the 100% owner and sole member of both Huskemaw and Productions.

RELIEF REQUESTED

8. By this Motion, the Debtors seek entry of an order directing the joint administration of their chapter 11 cases and consolidation thereof for procedural purposes only. The Debtors also request that the caption of their chapter 11 cases be modified to reflect their joint administration as captioned below:

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF WYOMING

In re:)
)
BOTW HOLDINGS, LLC,) Bankr. Case No. 24-20138
HUSKEMAW OPTICS, LLC and) Bankr. Case No. 24-20141
BEST OF THE WEST) Bankr. Case No. 24-20142
PRODUCTIONS, LLC,)
)(Jointly Administered under
Debtors-in-Possession.) Bankr. Case No. 24-20138)
)
) Chapter 11 (Subchapter V)

9. The Debtors request the Court permit use of a combined service list and correspondingly combined notices pursuant to a motion to limit notice that will be forthcoming once this motion is granted.

10. Bankruptcy Rule 1015(b) provides that, if two or more petitions are pending in the same court by or against a debtor and an affiliate, the court may order joint administration.

11. Joint administration is appropriate in these chapter 11 cases because the Debtors' financial affairs and business operations are related, and joint administration of the chapter 11 cases will ease administrative burden on the court and other parties in interest. The Debtors are affiliates under the meaning of § 101(2) insofar as 100% of the ownership interests of both Huskemaw and Productions are held by Holdings. Further, the Debtors operate under common management. Further, the United States Trustee has now appointed the same subchapter-v trustee to oversee the Debtors, Joli A. Lofstedt.

12. The Debtors anticipate that notices, applications, motions, other pleadings, hearings and orders in these cases will affect each of the Debtors. If each of the Debtors' cases was administered independently, there would be a great deal of duplicative pleadings and service. This unnecessary duplication of identical documents would be a wasteful use of the Debtors' limited resources, as well as other parties' and this Court's resources.

13. Joint administration will permit the Clerk of the Court to use a single general docket for these cases and combined notices to creditors and other parties in interest. Joint administration will also protect parties in interest by ensuring that such parties in each of the chapter 11 cases will be apprised of various matters before the court. Additionally,

supervision of the administrative aspects of these cases by the U.S. Trustee and subchapter-v trustee also will be simplified and streamlined.

14. Moreover, joint administration will not adversely affect the Debtors' respective constituencies because through the instant motion the Debtors seek only administrative, not substantive, consolidation of the Debtors' estates. Indeed, the rights of creditors and parties in interest will be enhanced by the reduced costs that will result from joint administration. Accordingly, this Court may order the joint administration of the Debtors' chapter 11 cases.

15. The Debtors request that a docket entry reflecting the joint administration of the Debtors' cases be made in the cases of Huskemaw and Productions as follows:

An order has been entered in this case directing the procedural consolidation and joint administration of the chapter 11 cases of BOTW Holdings, LLC, Huskemaw Optics, LLC and Best of the West Productions, LLC. The docket in Case No. 24-20138 should be consulted for all matters affecting this case.

16. Lastly, the Debtors request that all future entries for all cases be made under the Holdings case number, Case No. 24-20138.

WHEREFORE, the Debtors respectfully request that this Court enter an order: (a) authorizing the joint administration of the chapter 11 cases of Holdings, Huskemaw and Production for procedural purposes only; (b) directing the Clerk of the Court to make a docket entry as set forth herein; and (c) granting such other and further relief as this Court deems necessary and appropriate.

Dated: April, 22, 2024

Respectfully submitted,

MARKUS WILLIAMS YOUNG
& HUNSICKER LLC

By: /s/ Bradley T. Hunsicker

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*Proposed Counsel for Debtors BOTW Holdings,
LLC, Huskemaw Optics, LLC and Best of the West
Productions, LLC*

CERTIFICATE OF SERVICE

I hereby certify that on April 22, 2024, I caused a true and correct copy of the foregoing **JOINT MOTION FOR ORDER DIRECTING JOINT ADMINISTRATION OF RELATED CHAPTER 11 CASES FOR PROCEDURAL PURPOSES ONLY AND ENTRY OF RELATED RELIEF** to be served, electronically, upon the parties indicated below via the Court's CM/ECF system:

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By: /s/ Bradley T. Hunsicker
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